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**RECEIVED**

**JUN 30 2005**

**Federal Communications Commission  
Office of Secretary**

June 30, 2005

**VIA HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

DOCKET FILE COPY ORIGINAL

**Re: Amendment to Remington Arms Company, Inc. Request for Waiver of Part  
15 ET Docket No. 05-183**

Dear Ms. Dortch:

On June 20, 2005, SBC Communications Inc. filed Reply Comments in the Remington Arms Company, Inc. Request for Waiver of Part 15.

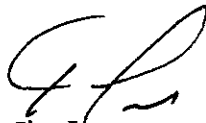
It's Reply Comments were filed in ET Docket No. 05-182 instead of ET Docket No. 05-183.

Attached is SBC's Amended Reply Comments in Remington Arms Company, Inc. Request for Waiver of Part 15 ET Docket No. 05-183.

Please replace the June 20, 2005, filing with the corrected filing attached to this letter.

If you have any questions, please do not hesitate to contact me at (202) 326-8895.

Sincerely,

  
Jim Lamoureux

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of )  
 )  
Remington Arms Company, Inc. ) ET Docket No. 05-183  
Request for Waiver of Part 15 )  
 )

**SBC'S REPLY COMMENTS<sup>1</sup>**

As with other parties in this proceeding,<sup>2</sup> SBC is concerned about the interference effects of Remington's device with other transmitting devices in the 2.4 GHz band. The device's transmit power of 1000 mW will cause interference to all other systems in the vicinity operating in the same frequency. The video surveillance application of the device will generate a continuous waveform for the entire period the device is in operation, making the spectrum unusable by any other devices within range. Depending on the surrounding environment, such interference could degrade the performance of—or render completely inoperable—other systems as far away as a few hundred meters to a few kilometers. Specifically, the Remington device could render inoperable WiFi systems within the vicinity of the device. Given the rapid proliferation of WiFi systems, the interference caused by Remington's device thus could have far-reaching effects: it could effectively disable wireless broadband access for anyone within range of the device. The Commission should give strong consideration to the magnitude of such effects. At a minimum, the Commission should impose stringent use and user restrictions, *e.g.*,

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<sup>1</sup> SBC Communications Inc. files these reply comments, on behalf of itself and its wholly-owned subsidiaries, including: Southwestern Bell Telephone LP, Pacific Bell, Nevada Bell, Ameritech Illinois, Ameritech Indiana, Ameritech Michigan, Ameritech Ohio, Ameritech Wisconsin, the Southern New England Telephone Company, ASI, AADS Illinois, AADS Michigan, AADS Indiana, AADS Ohio, AADS Wisconsin, SBC LD, and SBC Telecom (collectively "SBC").

<sup>2</sup> See, *e.g.*, *Cisco Systems Comments*.

limiting the sale and use of the device to federal, state and local police and public safety organizations for use only in life threatening situations, as a condition of granting Remington's request for waiver.

Respectfully Submitted,

/s/ Jim Lamoureux

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Paul K. Mancini

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June 20, 2005